

EXHIBIT E



April 26, 2018

Via Mail and E-mail: jimmy@doylefirm.com

James V. Doyle Jr.
Doyle Law Firm
Suite 650
2100 Southbridge Parkway
Birmingham, AL 35209

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

As you know, PTO-121 requires the preservation of explanted mesh materials and PTO-190 sets out a protocol for the preservation and testing of explanted mesh. Plaintiffs are required by PTO-190 to provide Ethicon with information regarding available pathology specimens. In addition, Plaintiffs are required to send preservation notices to explanting healthcare facilities, copying counsel for Ethicon. PTO-190 also requires plaintiffs to utilize Steelgate, Inc. for the storage of pathology specimens.

Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Hackney, Andra
Case No. 2:14cv10229

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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ashley.stubbs@butlersnow.com

BUTLER SNOW LLP

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Ridgeland, Mississippi 39157

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April 26, 2018

Page 2

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 30, 2018

Via Mail and E-mail: chernandez@fittslawfirm.com

Christina Y. Hernandez
Fitts Law Firm
Galleria Tower, Suite 1120
2700 Post Oak Boulevard
Houston, TX 77056

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Hale, Anna
Case No. 2:16cv10857

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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Sincerely,

BUTLER SNOW LLP

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ASHLEY STUBBS



April 30, 2018

Via Mail and E-mail: rjt@ttlf.com

Robert J. Talaska
The Talaska Law Firm
442 Heights Boulevard
Houston, TX 77007

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Harris, Suzanne
Case No. 2:16cv12010

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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ASHLEY STUBBS



April 27, 2018

Via Mail and E-mail: marc@liptonlaw.com

Marc E. Lipton
Lipton Law
Suite 3000
18930 West Ten Mile Road
Southfield, MI 48075

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Hempstead, Anita
Case No. 2:13cv09300

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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ASHLEY STUBBS



April 27, 2018

Via Mail and E-mail: mortonca@bellsouth.net

Cathy H. Morton
Kizer & Black
329 Cates Street
Maryville, TN 37801-4903

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Hodge, Barbara
Case No. 2:15cv12908

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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ASHLEY STUBBS



April 25, 2018

Via Mail and E-mail: mark.davis@daviscrump.com

Mark W. Davis
Davis & Crump
Third Floor
1712 15th Place
Gulfport, MS 39501

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Irvin Alice
Case No 2:14cv16534

Dodson, Mitsey
Case No. 2:13cv03546

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue

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blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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Sincerely,

BUTLER SNOW LLP

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ASHLEY STUBBS



April 24, 2018

Via Mail and E-mail: twalsh@brownchiari.com

Theresa M. Walsh
Brown Chiari
5775 Broadway
Lancaster, NY 14086

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Johnson, Lisa A.
Case No. 2:14cv29438

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 24, 2018

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If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

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ASHLEY STUBBS

BUTLER | SNOW

April 26, 2018

Via Mail and E-mail: lm@kbklawyers.com; mfox@mjfwlaw.com

Lina B. Melidonian
KABATECK BROWN KELLNER
Engine Company No. 28 Building
644 South Figueroa Street
Los Angeles, CA 90017

Mark A. Milstein
MILSTEIN ADELMAN
10250 Constellation Boulevard
Suite 1400
Los Angeles, CA 90067

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Keeth, Ami
Case No. 2:16cv00032
Zyph, Cleo
Case No. 2:16cv12024
Gullickson, Dina
Case No. 2:14cv15354

Riley, Barbara
Case No. 2:13cv19449
Price, Renie
Case No. 2:16cv12548
Haynes, Karen
Case No. 2:13cv24150

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If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

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ASHLEY STUBBS

BUTLER | SNOW

April 27, 2018

Via Mail and E-mail: dhumphrey@bernllp.com; mnair@bernllp.com; hunter@napolilaw.com

Debra J. Humphrey
Mahesh Nair
MARC J. BERN & PARTNERS
One Grand Central Place, Suite 950
60 East 42nd Street
New York, NY 10165

Hunter J. Shkolnik
Napoli Shkolnik
Suite 7413
350 Fifth Avenue
New York, NY 10118

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Whipple, Christine
Case No. 2:12cv05402

Ruedy, Lisa
Case No. 2:13cv32666

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged

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April 27, 2018

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between the parties immediately, following the procedure outlined in PTO-190.

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ASHLEY STUBBS



April 27, 2018

Via Mail and E-mail: dhumphrey@bernllp.com

Debra J. Humphrey
MARC J. BERN & PARTNERS
One Grand Central Place, Suite 950
60 East 42nd Street
New York, NY 10165

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

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Shutt, Helen
Case No. 2:17cv03843

Dunford, Jennifer
Case No. 2:17cv03312

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 27, 2018

Via Mail and E-mail: scott@graysharborattorney.com

Scott A. Campbell
Law Office of Scott Campbell, Inc.
115 South First Street
Montesano, WA 98563

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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March, Brenda
Case No. 2:13cv22928

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 27, 2018

Via Mail and E-mail: dave@WeStrikeBack.com; ram@WeStrikeBack.com

David M. Langevin
Rhett A. McSweeney
McSweeney Langevin
2116 2nd Avenue South
Minneapolis, MN 55404

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
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Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Gossett, Karen
Case No. 2:15cv05139

Watters, Wanda
Case No. 2:16cv01696

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged

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ASHLEY NADER STUBBS
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F 601.985.4500

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1020 Highland Colony Park
Ridgeland, Mississippi 39157

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April 27, 2018

Page 2

between the parties immediately, following the procedure outlined in PTO-190.

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 24, 2018

Via Mail and E-mail: BSchwartz@heardlawfirm.com

Robert A. Schwartz
Brent Coon & Associates
300 Fannin
Houston, TX 77002

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

As you know, PTO-121 requires the preservation of explanted mesh materials and PTO-190 sets out a protocol for the preservation and testing of explanted mesh. Plaintiffs are required by PTO-190 to provide Ethicon with information regarding available pathology specimens. In addition, Plaintiffs are required to send preservation notices to explanting healthcare facilities, copying counsel for Ethicon. PTO-190 also requires plaintiffs to utilize Steelgate, Inc. for the storage of pathology specimens.

Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Newnham, Vickii J.
Case No. 2:15cv14992

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 24, 2018

Page 2

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 27, 2018

Via Mail and E-mail: thaklar@haklarlaw.com

Thomas D. Haklar
Law Office of Thomas D. Haklar
Suite 1AA
320 Encinitas Boulevard
Encinitas, CA 92024

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

As you know, PTO-121 requires the preservation of explanted mesh materials and PTO-190 sets out a protocol for the preservation and testing of explanted mesh. Plaintiffs are required by PTO-190 to provide Ethicon with information regarding available pathology specimens. In addition, Plaintiffs are required to send preservation notices to explanting healthcare facilities, copying counsel for Ethicon. PTO-190 also requires plaintiffs to utilize Steelgate, Inc. for the storage of pathology specimens.

Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Oliver, Rebeca
Case No. 2:17cv04390

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 27, 2018

Page 2

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 26, 2018

Via Mail and E-mail: apangparra@justinianpllc.com; justinian@justinian.us

Amber Marie Seu Yin Pang Parra
Justinian Lane
JUSTINIAN
Building B, Suite 1
305 North Heatherwilde Boulevard
Pflugerville, TX 78660

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Powers, Linda
Case No 2:14cv12626

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue

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April 26, 2018

Page 2

blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 27, 2018

Via Mail and E-mail: hramey@rameylawfirm.com

Hardin R. Ramey
Ramey Law Firm
Suite 720
3131 McKinney Avenue
Dallas, TX 75204

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Wesley, Barbara
Case No. 2:13cv28498

Selph-Davis, Diane
Case No. 2:13cv23465

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 27, 2018

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If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 30, 2018

Via Mail and E-mail: jconnor@stobierski.com

John P. Connor
Stobierski & Stobierski
377 Main Street
Greenfield, MA 01301

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Smith, Kelly D.
Case No. 2:15cv03324

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 30, 2018

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If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 30, 2018

Via Mail and E-mail: transvaginal.mesh.solis@gmail.com

Andrew J. Fink
Solis Law Firm
5310 West Cermak Road
Cicero, IL 60804

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Perez, Silvia L.
Case No. 2:13cv16393

Villalobos, Sofia
Case No. 2:13cv18155

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 30, 2018

Page 2

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 23, 2018

Via Mail and E-mail: stewart@aldavlaw.com

Stewart R. Albertson
ALBERTSON & DAVIDSON
3491 Concours Street
Suite 201
Ontario, CA 91764

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Rita E. Valadez
Case No. 2:16cv01266

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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ashley.stubbs@butlersnow.com

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April 23, 2018

Page 2

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS

BUTLER | SNOW

April 30, 2018

Via Mail and E-mail: tdunken@gmail.com; JVaughan@DunkenWeeks.com;
jeff@legaltrialteam.com; dkohls@hansenkohls.com

B.T. Dunken Jr.
Jefrey R. Vaughan
Dunken Law Group
Suite 1075
1 Sugar Creek Center Boulevard
Sugar Land, TX 77478

Jeffrey R. Vaughan
Clark Love & Hutson
Suite 1600
440 Louisiana Street
Houston, TX 77002

Daniel V. Kohls
Hansen Kohls Sommer & Jacob
Suite 100
1520 Eureka Road
Roseville, CA 95661

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Wiegand, Ashley
Case No. 2:16cv07273

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Ridgeland, MS 39158-6010*

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*ASHLEY NADER STUBBS
601.985.4572
ashley.stubbs@butlersnow.com*

BUTLER SNOW LLP
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*Suite 1400
1020 Highland Colony Park
Ridgeland, Mississippi 39157*

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April 30, 2018

Page 2

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read 'Ashley Stubbs', with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 30, 2018

Via Mail and E-mail: wjwesq@aol.com

Willie J. Walker
The Walker Law Offices
Suite 3
625 West Union Street
Jacksonville, FL 32202-4764

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Wright, Tynise R.
Case No. 2:15cv00500

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 30, 2018

Page 2

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 30, 2018

Via Mail and E-mail: sscott@spanglaw.com

Stuart E. Scott
SPANGENBERG SHIBLEY & LIBER
1001 Lakeside Avenue East
Suite 1700
Cleveland, OH 44114

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Arendas, Janet M.
Case No. 2:13cv18724

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 30, 2018

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If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 27, 2018

Via Mail and E-mail: jquinn@pghtriallawyers.com

John E. Quinn
Portnoy & Quinn
3 Gateway Center, Suite 2325
401 Liberty Avenue
Pittsburgh, PA 15222

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Jordan, Crystal
Case No. 2:15cv15735

Crawford, Teresa
Case No. 2:15cv16305

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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ASHLEY NADER STUBBS
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ashley.stubbs@butlersnow.com

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April 27, 2018

Page 2

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS

BUTLER | SNOW

April 27, 2018

Via Mail and E-mail: rickl@lpm-triallaw.com; tomp_fed@lpm-triallaw.com;
buffym@lpm-triallaw.com

Richard N. Laminack
Thomas W. Pirtle
Buffy K. Martines
Laminack, Pirtle & Martines, LLP
5020 Montrose Boulevard, 9th Floor
Houston, Texas 77006

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

As you know, PTO-121 requires the preservation of explanted mesh materials and PTO-190 sets out a protocol for the preservation and testing of explanted mesh. Plaintiffs are required by PTO-190 to provide Ethicon with information regarding available pathology specimens. In addition, Plaintiffs are required to send preservation notices to explanting healthcare facilities, copying counsel for Ethicon. PTO-190 also requires plaintiffs to utilize Steelgate, Inc. for the storage of pathology specimens.

Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Bickel, Karen
Case No. 2:13cv19721

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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Sincerely,

BUTLER SNOW LLP

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ASHLEY STUBBS



April 25, 2018

Via Mail and E-mail: psadler@carabinshaw.com

Paul L. Sadler
CARABIN & SHAW
630 Broadway
San Antonio, TX 78215

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Gutierrez, Debra A.
Case No. 2:14cv01045
Abundis, Mary
Case No. 2:13cv23711
Davila, Rafaela
Case No. 2:16cv00935
Swavely, Terri
Case No. 2:14cv24222

Imhoff, Laurie
Case No. 2:13cv23712
Bardo, Paula
Case No. 2:13cv23717
Keller, Suzette
Case No. 2:13cv24825

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details

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April 25, 2018

Page 2

regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 30, 2018

Via Mail and E-mail: wwright@shipmanlaw.com

William G. Wright
Shipman & Wright
Suite 106
575 Military Cutoff Road
Wilmington, NC 28405

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Carpenter, Angela
Case No. 2:13cv23171

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 30, 2018

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If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 24, 2018

Via Mail and E-mail: butchboyd@butchboydlawfirm.com; jferrell@rgtaylorlaw.com

Ernest W. Boyd, Jr.
Butch Boyd Law Firm
2905 Sackett Street
Houston, TX 77098

James C. Ferrell
RG Taylor II, PC & Associates
Suite 400
4119 Montrose
Houston, TX 77006

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Cooke, Charlotte
Case No. 2:16cv04375

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 24, 2018

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If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 25, 2018

Via Mail and E-mail: lanceturner@carroll-turner.com

Lance W. Turner
Carroll & Turner
56 Court Street
Monticello, KY 42633

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Corder, Virginia
Case No. 2:16cv10988

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 25, 2018

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If you do not provide Ethicon with the requested information within seven (7) days of the date of this letter, Ethicon will be forced to file the attached motion relating to pathology and materials evidence. Your anticipated cooperation is greatly appreciated.

Sincerely,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Ashley Stubbs", with a long horizontal flourish extending to the right.

ASHLEY STUBBS



April 27, 2018

Via Mail and E-mail: mgdawson@hafif.com

Gregory K. Hafif
Michael G. Dawson
Law Offices of Herbert Hafif
269 West Bonita Avenue
Claremont, CA 91711
ghafif@hafif.com

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Daughters, Isabel
Case No. 2:14cv17334

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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Sincerely,

BUTLER SNOW LLP

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ASHLEY STUBBS



April 27, 2018

Via Mail and E-mail: attorneyjessicanorton@hotmail.com

Jessica L. Norton
Law Office of Jessica Norton
P. O. Box 1171
Maxton, NC 28364

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Deese, Sandra
Case No. 2:16cv01156

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 27, 2018

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BUTLER SNOW LLP

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ASHLEY STUBBS



April 30, 2018

Via Mail and E-mail: Rita@erlegal.com

Stewart J. Eisenberg
EISENBERG ROTHWEILER WINKLER
EISENBERG & JECK
1634 Spruce Street
Philadelphia, PA 19103

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Freiss-Zito, Deborah
Case No. 2:13cv24249

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 30, 2018

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BUTLER SNOW LLP

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ASHLEY STUBBS



April 30, 2018

Via Mail and E-mail: mike@gld-law.com

Michael T. Gallagher
The Gallagher Law Firm
2905 Sackett Street
Houston, TX 77098

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens, including no record of preservation letters being sent, for the following of your plaintiffs:

Vourvopoulos, Karen L.
Case No. 2:15cv09619

Jarvis, Mary E.
Case No. 2:15cv13888

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 30, 2018

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Sincerely,

BUTLER SNOW LLP

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ASHLEY STUBBS



April 30, 2018

Via Mail and E-mail: jtorry@torrylaw.com; chriscolaw@outlook.com

Jordan M. Torry
TERRY LAW GROUP
4265 San Felipe
Suite 1000
Houston, TX 77027

Roger N. Chrisco
THE CHRISCO LAW FIRM
414 Main Street
Suite A
Liberty, TX 77575

Re: Ethicon, Inc., Pelvic Repair System Products Liability Action
MDL No. 2327 – Wave 8 Pathology

Dear Counsel:

As you are aware, my firm represents Ethicon Inc. and Johnson & Johnson in the Ethicon MDL litigation. I write to request the information regarding explanted specimens in your Wave 8 cases that Plaintiffs are required to provide Ethicon pursuant to PTO-121 and PTO-190. If you fail to provide this information and remedy your non-compliance with the requirements in PTO-190, Ethicon will be forced to file the enclosed motion.

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Despite the requirements of PTOs-121 and -190, we have received no information about pathology specimens for your plaintiffs listed below. Further, it is our understanding that you have not entered into an agreement with Steelgate to store specimens from these same plaintiffs.

Goats, Brenda
Case No. 2:13cv26030

Please provide us with the required information for each of your Wave 8 cases listed above. This should include but is not limited to the surgery date and whether the explanted specimen is a gross specimen, tissue block, and/or histology slides. Further, please provide us with details regarding the whereabouts of the explanted specimens. To the extent any gross specimens, tissue blocks, and/or slides are available, division and/or apportionment of the specimens must be arranged between the parties immediately, following the procedure outlined in PTO-190.

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April 30, 2018

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BUTLER SNOW LLP

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ASHLEY STUBBS